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April 26, 2021

**VIA ELECTRONIC FILING**

Hon. Freda L. Wolfson, C.J.  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Room 2020  
Trenton, NJ 08608

**RE: Conforti v. Hanlon, Case 3:20-cv-08267-FLW-TJB  
Request for Extension of Time to File Opposition to Motions to Dismiss and  
to Enter Proposed Scheduling Order with Consent of Parties**

Dear Honorable Chief Judge Wolfson,

This firm represents the Plaintiffs in the above-captioned matter. At this time, the Defendants/Intervenors filed motions to dismiss which are currently pending before the Court. Plaintiffs' opposition is currently due on May 3, 2021, as per the Court's Order entered on March 17, 2021. Plaintiffs are responding to seven separate Motions to Dismiss filed by Defendants and by the Attorney General's Office which has intervened in this matter. Additionally, on April 23, 2021, the law firm of Weissman & Mintz LLC formally joined as co-counsel for the Plaintiffs, and Flavio L. Komuves, Esq. entered an appearance in this matter. In light of these considerations and having graciously obtained the consent of counsel of all Defendants/Intervenors, Plaintiffs are respectfully requesting that the Court grant us an additional three weeks to file an opposition brief, and adjust the time for Defendants to file reply briefs. We have attached a proposed consent order reflecting the proposed schedule.

Thank you for the Court's consideration of this matter.

Respectfully submitted,

/s/ Brett M. Pugach  
Brett M. Pugach, Esq.  
BROMBERG LAW LLC

*Counsel for Plaintiffs*

CC. All Counsel of Record (via electronic filing)

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